

DEAN K. DUNSMORE
DEPARTMENT OF JUSTICE
Environment & Natural Resources Division
801 B Street, Suite 504
Anchorage, Alaska 99501-3657
Telephone: (907)271-5452
Facsimile: (907)271-5827
Email: dean.dunsmore@usdoj.gov

Attorney for Federal defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

CITY OF ST. PAUL,)	
a Municipal Corporation)	Case No. 3:97-CV-0181 (HRH)
)	
Plaintiff,)	
)	
v.)	FEDERAL DEFENDANTS'
)	MOTION TO EXTEND
DONALD EVANS,)	STAY OF PROCEEDINGS
Secretary of the Unites States)	(UNOPPOSED)
Department of Commerce,)	
et al.)	
)	
Defendants.)	

Federal Defendants, on their own behalf and on behalf of and with the consent and agreement of defendant Tanadgusix Corporation, move for a continuation of the stay of proceedings on the cross-claims presented against the Federal Defendants by the Tanadgusix Corporation to and including January 31, 2007.

In support of the above motion, Federal Defendants show:

1. By Order (Docket Entry No. 302) filed May 18, 2006, proceedings on the cross-claims presented against the Federal Defendants by the Tanadgusix Corporation were stayed through July

31, 2006. The parties believe they are continuing to make sufficient progress toward a resolution of any dispute between defendants and the Tanadagusix Corporation, that a continuation of that stay is appropriate. The requested stay of proceedings is not intended to and is not understood to preclude any party for moving, upon good cause shown, to lift that stay.

2. Counsel for Federal Defendants has been authorized to represent that defendant Tanadgusix Corporation has no objection to the requested continuation of the stay of proceedings.

Dated this 4th day of August, 2006.

/s/ Dean K. Dunsmore
DEAN K. DUNSMORE
DEPARTMENT OF JUSTICE
Environment & Natural Resources
Division
801 B Street, Suite 504
Anchorage, Alaska 99501-3657
Telephone: (907) 271-5452
Facsimile: (907) 271-5827
Email: dean.dunsmore@usdoj.gov

Attorney for Federal defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of August, 2006, a copy of the foregoing FEDERAL DEFENDANTS MOTION TO EXTEND STAY OF PROCEEDINGS (UNOPPOSED) together with a Proposed ORDER were served by United States mail, first class, postage paid, to the following:

Terrance A. Turner
Douglas F. Strandberg
Charles H. Carpenter

and by United States mail, first class, postage paid, to the following counsel of record:

Ronald L. Baird

/s/ Dean K. Dunsmore
DEAN K. DUNSMORE